

AO 91 (Rev. 08/09) Criminal Complaint

Special Agent : Michael Wiggins

Telephone: 810.239.5775

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.
Bobby Boseman

Case: 2:21-mj-30377
Assigned To : Unassigned
Assign. Date : 08/05/2021
Description: CMP: USA v BOSEMAN (MAW)

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of 7/31/2021-8/3/2021 and 2/26/2021, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 1591 and
18 U.S.C. § 922(g)(1)

Offense Description

Sex trafficking using force, fraud, or coercion and
Possession of a firearm and ammunition by a prohibited person

This criminal complaint is based on these facts:
Please see the attached affidavit.



Continued on the attached sheet.


Complainant's signature

Michael Wiggins, Special Agent-FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: August 5, 2021

City and state: Detroit, Michigan


Judge's signature

Elizabeth A. Stafford, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT

I, Michael S. Wiggins, a Special Agent with the Federal Bureau of Investigation, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18 of the United States Code. I am empowered to conduct investigations of and to make arrests for offenses enumerated in Title 18 of the United States Code.

2. I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI), United States Department of Justice (DOJ), currently assigned to the FBI's Detroit Division, Flint Resident Agency (FLRA). I have been so employed since March 2004. I am currently assigned as the Coordinator and a member of the Northeast Michigan Trafficking and Exploitation Crimes Task Force (NEMTEC) which is a Federal Bureau of Investigation (FBI) managed task force with investigative members assigned from the Michigan State Police (MSP) and FBI. It is tasked with addressing Crimes Against Children and Human Trafficking threats in coordination and cooperation with its local and state partners.

3. As part of my employment, I have received training in and been involved in investigations regarding human trafficking, exploitation of children, drug trafficking, money laundering, threats, financial crimes, crimes involving gang related activities, child pornography and other violations of federal law.

4. I am conducting an investigation related to violations of the following statutes: 18 U.S.C. § 1591 (sex trafficking using force, fraud, or coercion) and 18 U.S.C. § 922(g)(1) (possession of a firearm and ammunition by a prohibited person). Based on the evidence discovered during the course of my investigation, probable cause exists that Bobby Boseman (DOB XX/XX/1978) committed violations of the above statutes within the Eastern District of Michigan.

5. This Affidavit is submitted for the limited purpose of establishing probable cause; this affidavit, therefore, may not include all the information collected during this investigation. This Affidavit is intended to show only that there is sufficient probable cause for the requested complaint and warrant and does not set forth all of my knowledge about this matter. The information contained in this affidavit is based on personal knowledge, on reports made to me by other law enforcement officers, my training and experience, and the combined knowledge, training, and experience of other law enforcement officers and agents with whom I have had discussions.

PROBABLE CAUSE

6. On August 3, 2021, Flint Police Department (FPD) Officer Albert Essix received a dispatch call for a welfare check at a residence in Flint, Michigan. The dispatch call was based on a 911 call received by police from a family member of Victim-1. Dispatch reported that Victim-1 had been missing for a couple of days and that the caller had followed Victim-1's cell phone to the location. Different people had told the caller that Victim-1 was tied up in the home with another female, and that they were being assaulted. Victim-1 was identified by her full name to the police, and Victim-2 was identified to police by her first name. Victim-2's full name was subsequently obtained by police.

7. Upon arrival at the residence on August 3, 2021, Officer Villarreal made contact with an unknown male through the front door. During this interaction, Officer Essix observed two unknown females appear from the rear of the residence. The two females denied they were Victim-1. One of the females then departed in a car parked in the driveway by driving through the yard to avoid the marked police unit at the end of the driveway. The other female departed on foot. Around this time, the unknown male left the doorway.

8. As Officer Essix walked up the driveway toward the rear of the residence, he observed two unknown males running away from the residence. At the

same time, another unknown female exited the rear door of the residence. Officer Essix attempted to speak with the female, but she continued to walk away.

9. Out of concern for the welfare of the victims identified in the 911 call, Officer Essix and Officer Villerreal entered the residence through the open rear door of the residence. Officer Essix located Victim-1 in a bedroom. She was fully clothed, lying on a couch. She had difficulty speaking. She complained of rib pain, and Officer Essix observed contusions around both eyes. Shortly thereafter, they located Victim-2 in a different bedroom. She was naked and lying face down with fluid around her head. She was able to respond to Officer Essix's calls to her. He observed her face and eye were swollen, and her jaw also appeared to have been injured. Police called for an ambulance for the victims.

10. Victim-2 was interviewed by police. She stated that both victims were dropped off at the residence on Saturday to buy drugs. They hung out for several hours getting high. One of the males at the residence, identified as "Killa B," accused Victim-1 of stealing drugs and refused to allow them to leave. He physically assaulted them. From that point on, they were scared to leave. Over the course of the next couple of days, they were sexually assaulted and held in separate rooms. She described being guarded by 4-5 males with guns. When drug customers came to the residence, the victims were forced to perform sex acts on them (males and females)

for payment. Victim-2 heard Killa B tell one of the customers, “Yeah, they’re bruised and bloody, but they’re still good for money.” The customers would pay Killa B to have sex with the victims.

11. Victim-2 further stated that they were beaten when they asked to use the bathroom or for food. On at least one occasion Victim-2 stated that she was hit with a machete with a cover on it. She was also pistol whipped with a handgun. The victims were also punched and choked. Victim-1 and Victim-2 were forced to perform sex acts on each other while others watched. These sex acts included oral sex and using a dildo on each other. When Victim-2 used the dildo on Victim-1, Victim-1 began to bleed. Just prior to the arrival of the officers, Victim-2 was forced to perform oral sex on an unknown male who also did not want to participate.

12. Victim-2 stated that Killa B’s first name was “Bobby.” Victim-1 stated that Killa B’s name was “Bobby Boseman.”

13. A federal search warrant for the residence was issued by Magistrate Judge Elizabeth Stafford on August 3, 2021, and the warrant was executed that same day. In the residence, law enforcement found a black dildo; a machete in a sheath, with blood near the machete; used condoms; cash currency; a firearm; ammunition; holsters; magazines; baggies of suspected crack cocaine; and drug paraphernalia.

14. Law enforcement also located Bobby Boseman (DOB XX/XX/1978) in the basement of the residence. Boseman was found with more than \$700 in United States currency in his pocket. Boseman was placed under arrest for violations of state law.

15. On August 4, 2021, Boseman agreed to speak with law enforcement. Boseman stated that he lived at the residence, and that Victim-1 and Victim-2 had been there since the day before his arrest. Boseman stated that he knew that the ammunition, holsters, and magazines were in his home. Boseman denied beating or having sex with either victim.

16. The residence was also the subject of a state search warrant on February 26, 2021. Prior to the search, officers received numerous complaints of drug activity at the residence. Officers also observed different individuals who exited their vehicles, entered the residence, and then returned to their vehicles within two minutes or less, which was consistent with drug trafficking at the residence. During the search, officers found a .40 caliber Desert Eagle pistol; a Winchester shotgun; numerous rounds of shotgun, rifle, and pistol ammunition; 12.1 grams of suspected cocaine; suspected crack cocaine; unknown pills individually wrapped in a plastic bag; four digital scales with suspected drug residue; and a total of approximately \$1,732 in cash.

17. Boseman was present at the residence at the time of the search, and he attempted to flee from police. Police found that he was wearing a shoulder holster, which contained a .40 caliber magazine that was loaded with 10 rounds of ammunition. The magazine was found to fit inside of the .40 caliber Desert Eagle pistol found inside the residence. Boseman also had approximately \$602 of the cash in the residence on his person. Four other individuals were also present at the residence.

18. Based on my training and experience, and the experience of other offices, one of the components of the ammunition was not manufactured in Michigan and the firearm was not manufactured in Michigan.

19. I have reviewed Boseman's criminal history, which includes the following convictions:

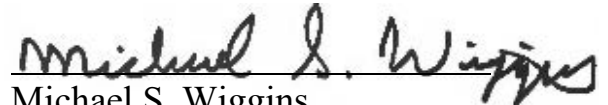
- December 20, 2018, in the 7th Circuit Court in Flint, Michigan: Possession of Cocaine less than 25 grams.
- March 1, 2004, in the 7th Circuit Court in Flint, Michigan: Aggravated Assault, and Home Invasion – 3rd Degree.
- June 7, 2001, in the 7th Circuit Court in Flint, Michigan: Attempted Receiving and Concealing Stolen Property \$1,000-\$20,000, and Fleeing & Eluding – 3rd Degree.

- October 30, 2000, in the 7th Circuit Court in Flint, Michigan:
Possession of Cocaine less than 25 grams, and Receiving and
Concealing Stolen Firearm.

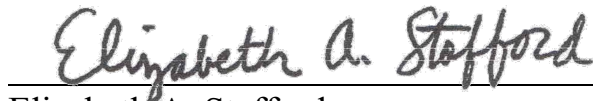
20. For the Home Invasion – 3rd Degree conviction in 2004, Boseman was sentenced to 24-60 months in prison.

CONCLUSION

21. Based on the aforementioned fact, there is probable cause to believe that Bobby Boseman violated 18 U.S.C. § 1591 (sex trafficking using force, fraud, or coercion) and 18 U.S.C. § 922(g)(1) (possession of a firearm and ammunition by a prohibited person) within the Eastern District of Michigan.


Michael S. Wiggins
Special Agent

Sworn to before me and signed in my presence
and/or by reliable electronic means on August 5, 2021.


Elizabeth A. Stafford
United States Magistrate Judge